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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE:

EX PARTE APPLICATION PURSUANT TO
28 U.S.C. §1782 FOR AN ORDER TO
TAKE DISCOVERY OF GAURAV PATEL
FOR USE IN A FOREIGN PROCEEDING

Case No. _____

FILED *EX PARTE*

(Document Filed Electronically)

[PROPOSED] ORDER

Upon review and consideration of: (1) Oak Trust, (2) Acorn Trust, (3) Eagle Trust, (4) Duffy Trust, (5) Robert J. Parfet Living Trust, (6) Geluk Global Fund Limited SAC (a company incorporated in the Bahamas), (7) Migration Investments, LLC (a Colorado, U.S. LLC), (8) Boustrophedon International Ltd (a company incorporated in Hong Kong), (9) Michael R. Shea, (10) Erin Shea, (11) Angela Ling, (12) Fuhua Ling, (13) Philip Bullock, (14) Lifang Liu, (15) Justin Payne, (16) Michael Dietzen, (17) Kimberly J. Dietzen, (18) Brian Sly, (19) David K. Sly, (20) Gregory Sly, (21) Karen Sly, (22) Nelson Sly, (23) Helen S. Sly, (24) Sly Family Trust, and (25) Tamara A. Sly Separate Property Trust's (together, the "Applicants") *Ex Parte* Application Pursuant to 28 U.S.C. § 1782 for an Order to Take Discovery of Gaurav Patel ("Patel") for Use in a Foreign Proceeding, draft subpoenas attached thereto as Exhibits A and B, accompanying Memorandum of Law in Support, and Declaration of Robert K. Campbell (collectively, the "Application"), seeking an order authorizing the issuance of subpoenas requiring Patel to provide

documents and testimony for use in connection with an anticipated proceeding in the High Court of England and Wales, London, England against Equiti Capital UK Limited (“Equiti UK”), the Court, being fully advised, having considered the Application, and finding good cause exists to exercise its discretion to do so, hereby GRANTS the Application.

IT IS HEREBY ORDERED THAT Applicants, by and through their counsel, are granted leave to issue the subpoena attached to the Application as Exhibit A to Patel (the “Document Subpoena”), pursuant to the Federal Rules of Civil Procedure, and pursuant thereto to require him to produce documents, within 14 days of receipt of same (or on another mutually-agreeable date selected by the Applicants and Patel) to Faegre Drinker Biddle & Reath, LLP, Jeffrey S. Jacobson, Esq., 600 Campus Drive, Florham Park, New Jersey 07932, or to any other location mutually-agreeable to the Applicants and Patel.

IT IS FURTHER ORDERED THAT Applicants, by and through their counsel, are granted leave to issue the subpoena attached to the Application as Exhibit B to Patel (the “Deposition Subpoena”), pursuant to the Federal Rules of Civil Procedure, and pursuant thereto to require him to appear for a remote deposition via video-conferencing technology, to be arranged by Applicants, and which will be recorded by video and stenographically by a company engaged in such services to be designated by Applicants, within 14 days of Patel’s compliance with the Document Subpoena (or on another mutually agreeable date selected by the Applicants and Patel).

IT IS SO ORDERED.

Dated: _____, 2021

U.S.D.J.